

EXHIBIT T

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger,

Page 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ALPHI PHI ALPHA FRATERNITY, INC., ,
a nonprofit organization on
behalf of members residing in
Georgia; SIXTH DISTRICT OF THE
AFRICAN METHODIST EPISCOPAL
CHURCH, a Georgia nonprofit
organization; ERIC T. WOODS;
KATIE BAILEY GLENN; PHIL BROWN;
JANICE STEWART,

Plaintiffs,

vs.

CASE NO. 1:21-CV-05337-SCJ

BRAD RAFFENSPERGER, in his
official capacity as Secretary
of Georgia,

Defendant.

DEPOSITION of JASON M. WARD, Ph.D.

February 8, 2023

9:00 a.m.

Taylor English Duma, LLP

1600 Parkwood Circle, Suite 200

Atlanta, GA 30339

Lucy C. Rateau, CCR, RPR

1 research into civil and voting rights in
2 Mississippi. They have an extensive archive.

3 Q. That raises a question. Your CV, Exhibit
4 3, at the very end, the last page which is numbered
5 page 35, has your professional memberships. And
6 you've got three listed there. I don't think you've
7 got any other sorts of organizational memberships
8 listed in your CV. Am I right about that?

9 A. I don't. Those would be professional
10 memberships. In my capacity as a historian, those
11 are the memberships I keep current.

12 Q. Are there any other organizations to which
13 you belong?

14 A. Certainly none of a professional context.
15 None come to mind that would be relevant to the
16 content of this work or report.

17 Q. Are you a member of any advocacy
18 organizations?

19 A. No.

20 Q. At the end of the second paragraph on page
21 22, the fourth line up, "Race has been the most
22 consistent predictor of partisan preference in
23 Georgia." Do you agree with that?

24 A. I do.

25 Q. Have you looked at other factors that would

1 influence partisan preference in Georgia besides
2 race?

3 A. I acknowledge that there are others. I
4 would stand by the claim that race is a more
5 consistent predictor, indicator than socioeconomic
6 status or educational level.

7 Q. Do you actually mention those in the
8 report?

9 A. I do not.

10 Q. But you're telling me now you think
11 socioeconomic level has something to do with
12 partisan preference?

13 A. I was simply giving examples of other
14 factors that one might point to or discuss in
15 relation to why people vote for one party or the
16 other. I'm not offering a professional opinion
17 about the degree to which those factors correlate.

18 Q. But since you are saying in your report
19 that race is the most consistent factor affecting
20 partisan preference, can you tell me as you sit here
21 today what you believe the other factors are?

22 A. I believe there are other factors. I
23 believe that you can document cases where one's
24 class status, socioeconomic status, educational
25 level, those have been studied, those have been